

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

SCOTT TURNAGE, CORTEZ D. BROWN,)	
DEONTAE TATE, JEREMY S. MELTON, ISSACCA)	
POWELL, KEITH BURGESS, TRAVIS BOYD,)	
TERRENCE DRAIN and KIMBERLY ALLEN)	
on behalf of themselves and all similarly situated persons,)	
)	
Plaintiffs,)	Civil Action No. 2:16-cv-02907-
)	SHM-tmp
v.)	
)	Jury Demanded
BILL OLDHAM, in his individual capacity as former)	
Sheriff of Shelby County, Tennessee; FLOYD BONNER,)	
JR., in his official capacity as the Sheriff of Shelby County,)	
Tennessee; ROBERT MOORE, in his individual capacity)	
as former Jail Director of Shelby County, Tennessee;)	
KIRK FIELDS, in his official capacity as the Jail Director)	
of Shelby County, Tennessee; CHARLENE MCGHEE, in)	
her individual capacity as former Assistant Chief of Jail)	
Security of Shelby County, Tennessee; REGINALD)	
HUBBARD, in his official capacity as Assistant Chief of)	
Jail Security of Shelby County, Tennessee; DEBRA)	
HAMMONS, in her individual capacity as former Assistant)	
Chief of Jail Programs; TIFFANY WARD in her official)	
capacity as the Assistant Chief of Jail Programs of Shelby)	
County, Tennessee; SHELBY COUNTY, TENNESSEE,)	
a Tennessee municipality; TYLER TECHNOLOGIES,)	
INC., a foreign corporation; GLOBAL TEL*LINK)	
CORPORATION, a foreign corporation; SOFTWARE)	
AG USA, INC., a foreign corporation; SIERRA-CEDAR,)	
INC., a foreign corporation; SIERRA SYSTEMS GROUP,)	
INC., a foreign corporation, and TETRUS CORP, a foreign)	
Corporation,)	
)	
Defendants.)	

NOTICE TO TAKE THE DEPOSITION OF KEITH BURGESS

TO: **Keith Burgess**

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Pursuant to Federal Rule of Civil Procedure 30(a)(1), Defendants Shelby County, Tennessee, Bill Oldham, Robert Moore, Charlene McGhee, Debra Hammons, Floyd Bonner, Jr., Kirk Fields, Reginald Hubbard, Tiffany Ward (collectively “Shelby County Defendants”), Tyler Technologies, Inc., Global Tel*Link Corporation, Software AG USA, Inc., Sierra-Cedar, Inc., Sierra Systems Group, Inc., and Tetrus Corp. will take the deposition of **Keith Burgess via Zoom Video Conferencing on Thursday, October 1, 2020 at 10:30 a.m. (CST)** and continuing until such time as completed. A link to the video conference will be provided to participating parties via email.

The testimony shall be recorded by a certified court reporter by stenographic, video, audio, electronic and/or other means. The deposition shall be taken before a notary public or other officer authorized by law to administer oaths.

The deposition is for class certification discovery. It may be used as evidence and for all other purposes authorized by law.

Respectfully submitted,

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*Counsel for Defendants Shelby County, Tennessee,
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Reginald Hubbard and Tiffany Ward*

CERTIFICATE OF SERVICE

I certify that the foregoing is being filed via the Court's ECF system this 28th day of September, 2020, for service on all persons registered in connection with this case, including:

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